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**Attorney for Plaintiff**  
**STACY SHAW**

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

**-o000o-**

**STACY SHAW,**

**No. 2:25-cv-01432-AC**

**Plaintiff,**

**STIPULATION AND [proposed]  
ORDER FOR EXTENSION OF  
TIME TO FILE PLAINTIFF'S  
REPLY BRIEF**

**v.**

**Frank Bisignano,**  
**COMMISSIONER OF SOCIAL SECURITY,**

**Defendant.**

**/**

IT IS HEREBY STIPULATED by and between the parties, through their respective undersigned attorneys, and with the permission of the Court, that plaintiff's time to file a motion for summary judgment is extended to November 26, 2025.

This is a third extension. The reason for this was limned in plaintiff's request for a second extension. This case has a long, complex procedural history and has been to federal court before. Plaintiff's counsel began working on a motion for summary judgment following the first

1 extension, but quickly switched to writing a five-page settlement discussion letter because  
2 plaintiff may move for a remand on the ground of missing evidence and there are also further  
3 significant problems in this protracted case. Due to the current lapse in government funding,  
4 defendant's consideration and finalizing of any response has been delayed; for that reason,  
5 defendant was not even available for discussion during most of the previous extension period;  
6 but defendant here indicates it is still considering remand.  
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8  
9 Dated: October 28, 2025

/s/ Jesse S. Kaplan  
JESSE S. KAPLAN  
Attorney for Plaintiff

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12  
13 Dated: October 28, 2025

/s/ per e-mail authorization


14 OSCAR GONZALEZ de LLANO  
15 Special Assistant U.S. Attorney  
16 Attorney for Defendant  
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18 **ORDER**

19  
20 For good cause shown on the basis of this stipulation, the requested extension of  
21 plaintiff's time to file plaintiff's motion for summary judgment is extended to November 26,  
22 2025.

23 SO ORDERED.

24 Dated: October 29, 2025

25   
26 ALLISON CLAIRE  
27 UNITED STATES MAGISTRATE JUDGE  
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